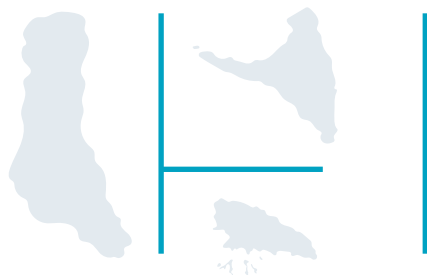




Fisheries
Transparency
Initiative

TAKING STOCK

Online Transparency of Fisheries
Management Information



Union of
Comoros

2022 Summary Assessment Report

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Every effort has been made to verify the accuracy of the information contained in this assessment. All information was believed to be correct as of September 2022. Nevertheless, the Fisheries Transparency Initiative (FiTI) cannot accept responsibility for the consequences resulting from the use of this assessment or its contents by others.

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Furthermore, in conducting this assessment, the FiTI did not investigate the veracity or completeness of the published information and did not make any judgement about the integrity of the information or practices disclosed.

We would like to thank all the individuals and institutions who contributed to the various stages of research and preparation of this assessment.

The Fisheries Transparency Initiative (FiTI) is a global multi-stakeholder initiative that strengthens transparency and collaboration in marine fisheries management.

By making fisheries management more transparent and inclusive, the FiTI promotes informed public debates on fisheries policies and supports the long term contribution of the sector to national economies and the well-being of citizens and businesses that depend on a healthy marine environment.



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www.fiti.global

TAKING STOCK: Online Transparency of Fisheries

Management Information assesses the level of information that Comoros' national authorities publish on government websites regarding the country's marine fisheries sector.



CONTENTS

Sustainable fisheries need transparency	04
About this assessment	07

CONTEXTUAL INFORMATION ON MARINE FISHERIES IN COMOROS	10
--	-----------

KEY FINDINGS	12
---------------------------	-----------

Public access to fisheries information	12
--	----

Giving meaning to transparency: Notable examples	15
--	----

A DEEP DIVE INTO PUBLIC ACCESS TO FISHERIES INFORMATION	18
--	-----------

Available online?	19
-------------------------	----

Up to date?	21
-------------------	----

Easy to find?	22
---------------------	----

'Good transparency practices'	24
-------------------------------------	----

RECOMMENDATIONS FOR COMOROS NATIONAL AUTHORITIES	25
---	-----------



Transparency needs trust	27
--------------------------------	----

ANNEX: Assessment procedures	28
------------------------------------	----

Comoros' TAKING STOCK: Online Transparency of Fisheries Management Information assessment consists of this Summary Assessment Report, as well as an in-depth Detailed Assessment Report. Both reports, as well as information on the methodology, can be found at:
www.fiti.global/taking-stock



SUSTAINABLE FISHERIES NEED TRANSPARENCY

For millennia, those who dedicated themselves to fishing, whether for food, income or recreation, did not need to worry about the sustainable management of this natural resource. Fish stocks replenished themselves with ease. **This is no longer the case.** The ocean is under increasing threats from myriad impacts, like climate change, pollution, and overfishing.

Governments have the fundamental obligation to manage common resources, such as fish, on behalf of their citizens. But this invokes a complex challenge: to ensure that fishing and fish trade contribute to income, employment, food and nutrition for millions of people, while conserving marine biodiversity for present and future generations.

Public availability of information is critical to achieving sustainable fisheries. Yet, transparency in fisheries management has not been a priority. Many governments do not disclose basic information on their fisheries sectors, such as laws, permits, fishing agreements, stock assessments, financial contributions, catch data and subsidies. Additionally, there are widespread concerns that companies are not consistently reporting accurate information on catches, fishing practices and payments to governments. The data that is already publicly available is too often incomplete, outdated, unverified, or not readily accessible.



Lack of basic transparency could be seen as an underlying facilitator of all the negative aspects of the global fisheries sector – IUU fishing, fleet overcapacity, overfishing, ill-directed subsidies, corruption, poor fisheries management decisions, etc. A more transparent sector would place a spotlight on such activities whenever they occur, making it harder for perpetrators to hide behind the current veil of secrecy and requiring immediate action to be taken to correct the wrong.

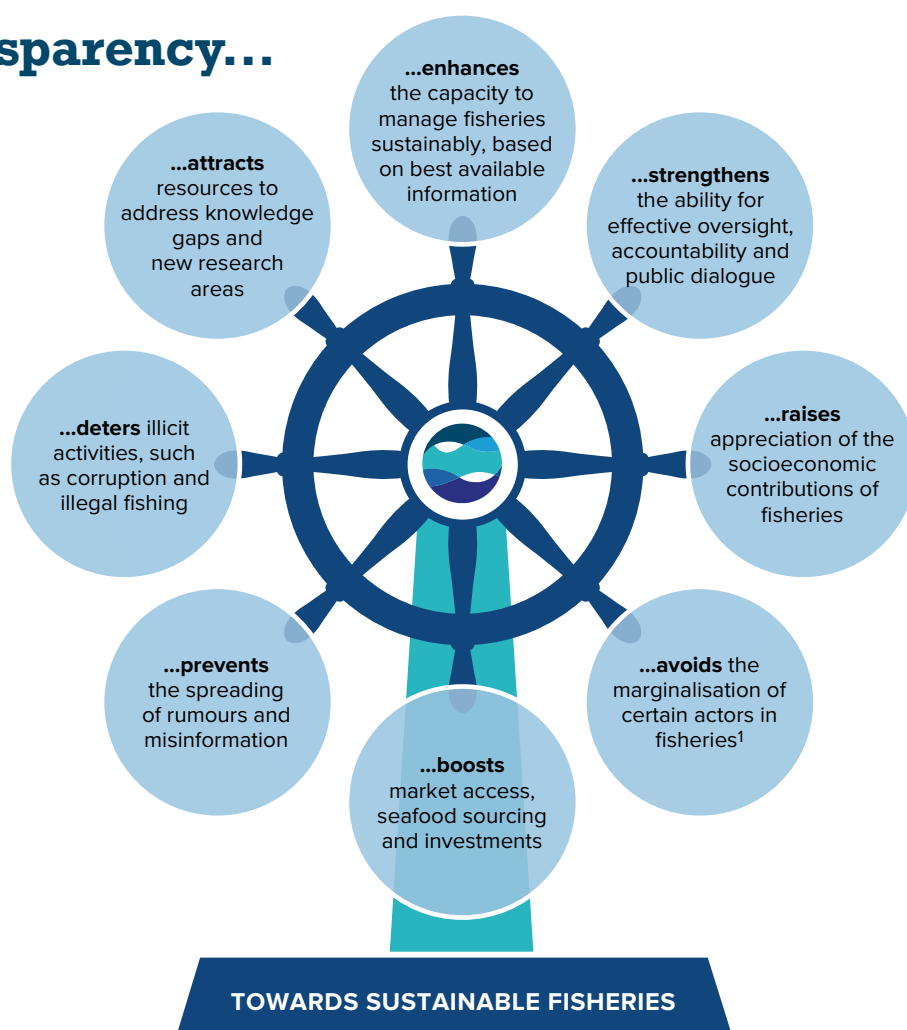
Food and Agriculture Organization of the United Nations (FAO)
The State of World Fisheries and Aquaculture 2010



Enhancing transparency in fisheries management appeals to all stakeholders that appreciate the enormous value of marine fisheries – whether that relates to food and nutrition security, employment, the value to national economies, or the cultural importance of fishing.

Transparency in fisheries management yields multiple benefits, and their relevance and applicability vary depending on the national context.

Transparency...



Promoting these positive features of fisheries lies at the heart of the Fisheries Transparency Initiative (FiTI).



Fisheries
Transparency
Initiative

¹ In particular small-scale fisheries and women.

Transparency is not voluntary. It is a government's duty and a citizen's right!

The provision of accessible, timely and credible information on a country's marine fisheries is increasingly becoming a **legal requirement for governments**, stemming, among other things, from Freedom of Information laws. Such laws are frequently based on three key principles: *public participation*, *access to justice* and *access to information*. The last of these principles implies that the public should be able to obtain environmental information (including information about their country's fisheries sector) with only limited, explicitly defined exceptions arising from justifiable confidentiality claims and security matters.



The Constitution of Comoros enshrines freedom of information as a fundamental right, however no legal instrument or regulatory framework exists that sets out the procedures by which government bodies must disclose information to the country's citizens.

A new **Code de l'Information et de la Communication** was enacted in January 2022 but does not facilitate public access to government information, focusing more on the rights and duties of journalists than on issues of transparency of national authorities. Comoros also does not have a law on access to information.

However, the government of Comoros is making concerted efforts to digitise its services and make more of the information it produces available online. The **Stratégie Comores Numérique 2028**,² introduced in December 2018, outlines the government's intention to modernise its digital infrastructure and embrace a system of e-governance. Among numerous other objectives, the strategy highlights the need to improve rates of internet penetration in Comoros. Although there is no explicit mention of fisheries in the strategy, it is assumed that this gradual move towards transparency will see an increasing amount of fisheries information published online. The importance of digitisation as a catalyst for national development is also highlighted in the **Plan Comores Émergent 2020-2030**.³

- Comoros is not a member of the **Open Government Partnership (OGP)**.
- To date (November 2022), the government of Comoros has not committed to join the **Fisheries Transparency Initiative (FiTI)**.



The importance of public access to government information is also emphasised in the UN Sustainable Development Goals (SDGs). Target 16.10 of the SDGs calls on all states to adopt legislation or policies guaranteeing the right to information, which is essential not only for the achievement of Goal 16, but is an enabler to achieving other SDGs.

² <https://anaden.org/strategie>













³ <https://diplomatie-comores.org/index/doc/synthese-du-plan-comores-emergent.pdf>

ABOUT THIS ASSESSMENT

This is the first time that Comoros has been assessed regarding the online transparency of its marine fisheries sector.

This TAKING STOCK assessment covers 12 thematic areas of fisheries management, as defined by the FiTI Standard.⁴

The **FiTI Standard** is the only internationally recognised framework that defines what information on fisheries management should be published online by national authorities. The FiTI Standard was developed over two years in a global multi-stakeholder endeavour. Its objective is to contribute to the sustainability of marine fisheries by increasing the accessibility and credibility of national fisheries management information.

- | | | | | | |
|----|---|---|-----|--|------------------------------------|
| #1 |  | Fisheries Laws, Regulations and Official Policy Documents | #7 |  | Post-Harvest Sector and Fish Trade |
| #2 |  | Fisheries Tenure Arrangements | #8 |  | Fisheries Law Enforcement |
| #3 |  | Foreign Fishing Access Agreements | #9 |  | Labour Standards |
| #4 |  | The State of the Fisheries Resources | #10 |  | Fisheries Subsidies |
| #5 |  | Large-Scale Fisheries | #11 |  | Official Development Assistance |
| #6 |  | Small-Scale Fisheries | #12 |  | Beneficial Ownership |

For this assessment, these 12 thematic areas have been broken down into a total of **39 transparency elements**.⁵

⁴ <https://www.fiti.global/fiti-standard>

⁵ An overview of these 39 transparency elements can be found in the section '[Key findings](#)'.

This assessment evaluates whether basic information on the Comoros' marine fisheries sector is **freely available** on government websites, whether it is **up to date** and whether it is **easy to find**.⁶



Additionally, this assessment:

- Considers whether information is published in a way that renders it easy to **(re)use**, e.g. to download, search and filter;
- Documents instances of **'good transparency practices'**, where published information allows non-experts to draw reliable conclusions;⁷ and
- Proposes practical **recommendations** to improve online transparency around Comoros' marine fisheries sector.



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This assessment is intended to support national authorities in Comoros to improve transparency in fisheries management and to stimulate interest in fisheries among a wide range of stakeholders.

It also establishes a comprehensive benchmark for evaluating progress over time.



⁶ For more information about the assessment's methodology, please refer to <https://www.fiti.global/taking-stock/methodology>.

⁷ For example, national authorities may utilise innovative techniques to help visualise information, such as online information systems or fact sheets.



Public disclosure of information cannot be directly equated with actual progress towards sustainable fisheries management.

A lack of transparency in fisheries management is not always a deliberate state of affairs. Governments with poor levels of transparency are often viewed negatively, as if driven by the desire to hide information from public scrutiny. However, what may be perceived as opacity or secretive practices is often the result of other factors, such as the complexity of the fisheries sector, a lack of technology, expertise and staff, or legal concerns. Some government ministries or national agencies, particularly those that are underfunded, may not prioritise transparency. Unfortunately, these arguments can also be used as a convenient excuse to avoid scrutiny.

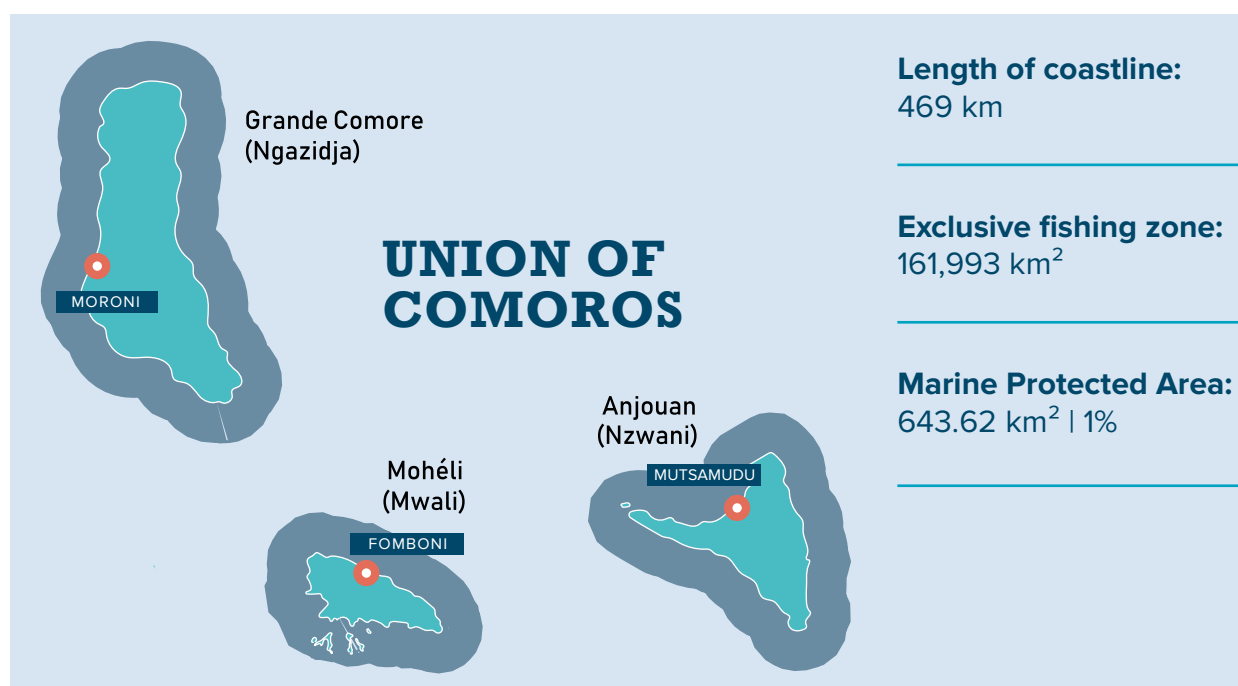
A low level of transparency in this TAKING STOCK assessment may not be a sign of wrongdoing, but rather highlights an opportunity for national authorities to enhance disclosure to stakeholders. Likewise, a high level illustrates strong disclosure systems, but this may not reflect operational success regarding the sustainable management of marine fisheries.

Transparency should also not be misinterpreted as a direct indicator for ethical behaviour, such as honesty and integrity.

This assessment is therefore not an end in itself. Instead, it takes stock of current disclosure practices against an internationally recognised transparency framework – the FiTI Standard – with a view to starting a conversation with all relevant stakeholders in the marine fisheries sector of Comoros.

The ambition is that this and future **TAKING STOCK** assessments will contribute to making government transparency the global norm in fisheries management.

CONTEXTUAL INFORMATION ON MARINE FISHERIES IN COMOROS



Recent developments relevant to Comoros' marine fisheries sector



In February 2021, the Ministry responsible for fisheries introduced a coastal fisheries management plan with a five-year implementation timeframe. The plan, which sets management objectives that affect subsistence, traditional, artisanal and sports fishers, was developed based on a participatory approach involving different stakeholders working together in a *Groupe National de Travail Elargi*.



The government of Comoros is in discussions with financial and technical partners to relaunch the Comoros National Fishing Company, a fish processing plant with the potential to play a key role in the country's socio-economic development through the creation of jobs and resumption of exports of fish and fish products overseas.



The World Bank's SWIOFish 1 project in Comoros, which supported the development of a fisheries statistics system (including strategy, enumerators, equipment, operational costs and production of annual statistical bulletins) ended in 2021. This raises doubts around the continuity of several key drivers of fisheries transparency in Comoros, such as the annual bulletins.



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The marine fisheries sector in Comoros plays an important role in fulfilling the economic, employment, food security, and nutrition needs of its citizens.⁸

CONTEXTUAL
INFORMATION

Capture fisheries production

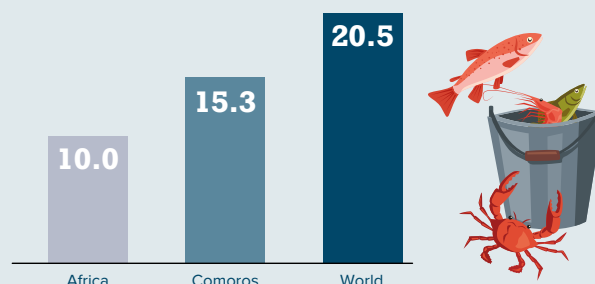
(tonnes, live weight)



Source: FAO 2022. Fishery and Aquaculture Country Profiles. Comoros Country Profile Fact Sheets. Fisheries and Aquaculture Division

Fish available for consumption

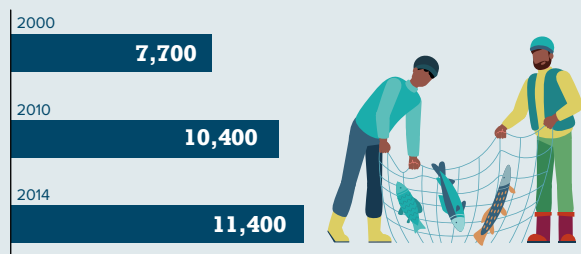
kg/per capita



The average amount of fish available for consumption in Comoros is higher than the total average for Africa.

Source: FAO. The State of World Fisheries and Aquaculture (2022) FAO. GLOBEFISH Market Profile - 2019

Number of fishers



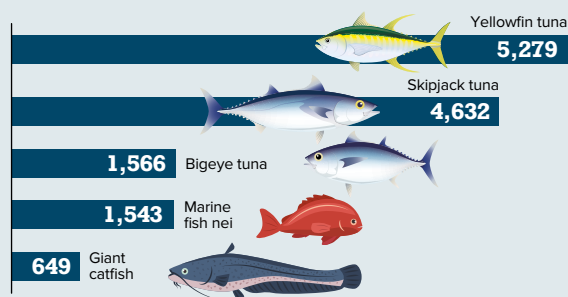
Source: FAO 2022. Fishery and Aquaculture Country Profiles. Comoros Country Profile Fact Sheets. Fisheries and Aquaculture Division

Number of fishing vessels



Source: FAO 2022. Fishery and Aquaculture Country Profiles. Comoros Country Profile Fact Sheets. Fisheries and Aquaculture Division

Top five species



Source: FAO. GLOBEFISH Market Profile - 2019 (in tonnes, by production volume)

Export of fish and fish products

Comoros does not currently export fish or fish products. However, initiatives are underway to restart exports.




⁸ This information reflects international statistics (e.g. from the United Nations FAO), which in some cases may differ from national statistics. In addition, this report does not state the contribution of the Comoros' fisheries sector to the national Gross Domestic Product (GDP). Although this is a common way of expressing the economic value of fisheries, GDP is not sufficient for fully representing the overall social, economic and environmental costs and benefits of the sector.

KEY FINDINGS

PUBLIC ACCESS TO FISHERIES INFORMATION

! This assessment shows that Comorian national authorities place certain efforts on publishing fisheries management information online. However, a significant amount of information is not publicly accessible, and the quality of what is available online can often be improved.



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- For **16 out of 34** applicable transparency elements, Comorian national authorities publish information online ('Public Access'), although with varying quality.
- There is no information published for **14** transparency elements.
- No information has yet been produced by Comorian national authorities for **4** transparency elements.

Not produced

Information for 4 transparency elements has **not yet been collected or compiled**.

Strong public access

Information for 2 transparency elements is **available online, up to date and easy to find**.

Moderate public access

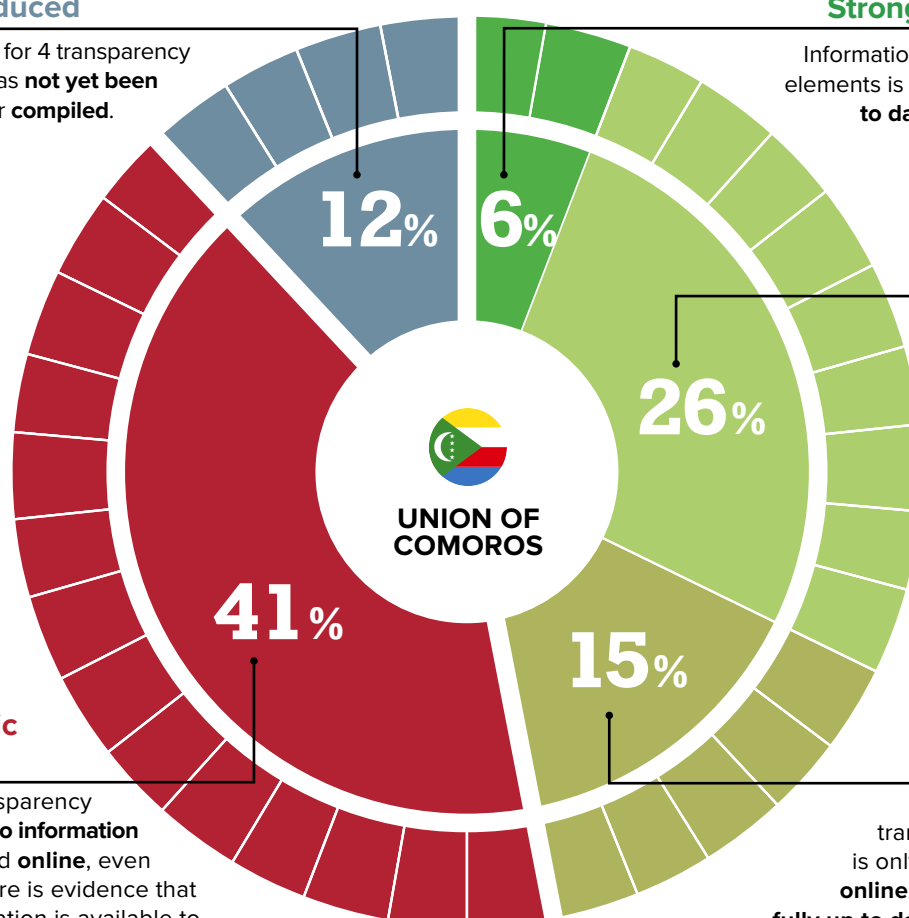
Information for 9 transparency elements is **mostly available online, but is only partially up to date or easy to find**.

Weak public access

Information for 5 transparency elements is only **partially available online**, and is also **neither fully up to date nor easy to find**.

No public access






For 14 transparency elements, **no information** is published **online**, even though there is evidence that this information is available to national authorities.









5 of the 39 transparency elements is considered as **not applicable** to Comoros' marine fisheries sector (see [Annex](#)).






Detailed overview







Thematic area	ID	Transparency element	AVAILABLE ONLINE?	UP TO DATE?	EASY TO FIND?	
 Fisheries Laws, Regulations and Official Policy Documents	1-A	Laws on marine fisheries	✓	✓	✓	Moderate public access
	1-B	Fisheries policy documents	✓	✗	✗	Weak public access
	1-C	Fisheries management plans	✓	✓	✓	Strong public access
 Fisheries Tenure Arrangements	2-A	Commercial fishing (large-scale and small-scale)	✓	✓	✓	Moderate public access
	2-B	Coastal subsistence fishing	✓	✓	✗	Moderate public access
	2-C	Scientific and exploratory fishing	✓	✓	✓	Moderate public access
	2-D	Sport fishing	✓	✓	✓	Moderate public access
 Foreign Fishing Access Agreements	3-A	Foreign-flagged vessels fishing in Comorian waters	✗	✗	✗	No public access
	3-B	Comoros-flagged vessels fishing in foreign waters	—	—	—	Not applicable
 The State of the Fisheries Resources	4-A	National reports on the state of marine fish populations	⦿	⦿	⦿	Not produced
	4-B	Scientific stock assessments	⦿	⦿	⦿	Not produced
 Large-Scale Fisheries	5-A	Vessels	✗	✗	✗	No public access
	5-B	Payments	✗	✗	✗	No public access
	5-C	Catches within Comorian waters	✗	✗	✗	No public access
	5-D	Catches outside Comorian waters	✗	✗	✗	No public access
	5-E	Landings in Comorian ports	—	—	—	Not applicable
	5-F	Transshipments and landings in foreign ports	✗	✗	✗	No public access
	5-G	Discards	✗	✗	✗	No public access
	5-H	Fishing effort	✗	✗	✗	No public access

 To a full extent
  To a large extent
  To a limited extent
  No
  Not produced
  Not applicable



Detailed overview

			  			
Thematic area	ID	Transparency element	AVAILABLE ONLINE?	UP TO DATE?	EASY TO FIND?	
 Small-Scale Fisheries	6-A	Vessels	✓	✓	✓	Moderate public access
	6-B	Licenses	✓	✓	✓	Moderate public access
	6-C	Fishers	✓	✓	✓	Moderate public access
	6-D	Payments	✗	✗	✗	No public access
	6-E	Catches	✓	✓	✓	Strong public access
	6-F	Discards	—	—	—	Not applicable
 Post-Harvest Sector and Fish Trade	7-A	Imports	✓	✗	✗	Weak public access
	7-B	Exports	—	—	—	Non applicable
	7-C	Employment in commercial fisheries	✓	—	✓	Weak public access
	7-D	Employment in informal fisheries	✓	—	✓	Weak public access
 Fisheries Law Enforcement	8-A	Enforcement of laws	✓	✓	✓	Moderate public access
	8-B	Sanctions for major offences	✗	✗	✗	No public access
 Labour Standards	9-A	Enforcement of labour standards	✗	✗	✗	No public access
	9-B	Sanctions for labour standard offences	✗	✗	✗	No public access
 Fisheries Subsidies	10-A	Government financial transfers or subsidies	✗	✗	✗	No public access
 Official Development Assistance	11-A	Assistance for national fisheries development	✗	✗	✗	No public access
	11-B	Assistance for foreign fisheries development	—	—	—	Not applicable
 Beneficial Ownership	12-A	Legal basis for beneficial ownership transparency	✓	✓	✗	Weak public access
	12-B	Beneficial ownership registry	—	—	—	Not produced
	12-C	Beneficial ownership disclosure in fisheries	—	—	—	Not produced

 To a full extent
  To a large extent
  To a limited extent
  No
  Not produced
  Not applicable



GIVING MEANING TO TRANSPARENCY: NOTABLE EXAMPLES



The value of this TAKING STOCK assessment does not only lie in understanding what information on a country's marine fisheries is available online, and where gaps exist. Fundamentally, and in very simple terms, **public access to fisheries information is important to help answer critical questions about the sustainability of the sector.**

Examples

Who manages our fisheries?

Are our fisheries being sustainably managed?

What is the contribution of marine fisheries to our national food security?

How much does my country earn from our fisheries resources?

Who catches our fish?

What is the value of fisheries to our national economy?

How is my country dealing with illegal, unreported and unregulated fishing?

How well is the government protecting the rights of people working in the fisheries sector?



Government

Fishers
(Industrial and artisanal)

Media

Parliamentarians

Civil Society Organisations

Academia

Given the complexity of fisheries management, answering such questions is not always a straightforward task. However, by increasing public access to fisheries information, governments provide their citizens and business partners the necessary means to engage in informed public debates.



Comoros' national authorities proactively disclose certain fisheries information that supports public understanding and appreciation of the sector and helps to answer important questions. Notable examples include:

✓	What are the total catches for Comoros' artisanal sector?	The government of Comoros publishes a wide range of catch data for the artisanal sector through the annual Fisheries Statistical Bulletins. Catches are disaggregated according to a variety of different categories, such as island, vessel type and fishing unit, as well as more than 50 different fish species.
✓	What are the economic contributions of fisheries in Comoros?	The annual Fisheries Statistical Bulletins published by the government include a section that estimates the economic contributions of fisheries to Gross Domestic Product (GDP) as well as the additional value it brings to the country.

Comorian national authorities do not publish information relating to several important areas of the country's fishing sector because this information has not yet been collected or compiled. This clearly impedes the government's capacity for sustainable fisheries management as well as the ability of other stakeholders to better understand the sector. However, it is acknowledged that this may be because national authorities are targeting different priorities or simply do not have the technical, financial or human resources needed to produce such information. Notable examples include⁹:

⊘	How healthy are Comoros' fish stocks?	Despite the value of marine fish to the economy and food security of Comoros, and the large numbers of people that rely on the sector for employment, the government of Comoros does not produce regular reports on the health of marine biodiversity. The country is largely dependent on the support of foreign partners to undertake scientific stock assessments of its fisheries resources.
⊘	Who benefits from fishing in Comorian waters?	The government of Comoros has not yet worked to produce dedicated rules and procedures to incorporate beneficial ownership into filings that regulate access to fisheries, nor to compile a register of the operators or beneficial owners of vessels flying the Comorian flag.
⊘	How inclusive is the decision-making process in Comoros' fisheries?	The government of Comoros is yet to produce formal mechanisms for external oversight and public consultations for decisions affecting fisheries tenure arrangements, potentially marginalising artisanal fishers, civil society and other important stakeholders from the participative governance of the sector.

⁹ Countries that implement the FiTI follow its core principle of 'progressive improvement', which states that countries are not expected to have complete data for every transparency requirement from the beginning. Instead, they must disclose the information they have, and where important gaps exist, demonstrate improvements over time.

The government of Comoros does not currently publish information online regarding numerous key areas of sustainable fisheries management, even though there is evidence that this information is available to national authorities. Notable examples include:

✗	What is the extent of large-scale fishing in Comorian waters?	While the Comorian national fleet is almost entirely artisanal, there is evidence that foreign foreign-flagged industrial vessels operate in the country's waters. However, no vessel registry and neither catch data nor payment information from these vessels is available online, making it impossible to assess the extent of this sub-sector. There is also no information available online on the fisheries agreements that Comoros has signed with foreign partners to allow foreign-flagged vessels to fish in national waters.
✗	How does the government support the fisheries sector in Comoros?	There is evidence that the government of Comoros has supported the marine fisheries sector in the past, for example through fuel subsidies, reductions in customs taxes on imports and the valorisation of fisheries products. However, there is no information available online indicating whether this support is still offered today, and if so, its extent.
✗	How much does Comoros earn from fishing activities in its waters?	Neither the Ministry responsible for fisheries nor the Ministry responsible for finance publish information regarding the actual revenues generated by the government from allowing fishing activities in Comorian waters (both by national and foreign-flagged vessels).
✗	Who is working in Comoros' fisheries sector?	Although the government of Comoros publishes some employment data online, it is considered incomplete (for example, only accounting for fishers that hold a 'fishing card'). Furthermore, this data is generally only published in an aggregated format which fails to illustrate the importance of different subsectors or to shine a light on the role of women in Comorian fisheries.
✗	How is Comoros enforcing laws and regulations in its fisheries sector and who is violating these rules?	The government of Comoros publishes very little information on the activities it undertakes to enforce fisheries laws and regulations. A record of convictions for major violations of these rules is also not available online.



A DEEP DIVE INTO PUBLIC ACCESS TO FISHERIES INFORMATION



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Additional important insights can be gained by investigating whether the information published by the government ("Public access") meets basic information requirements, is up to date and easy to find.



AVAILABLE
ONLINE?



UP TO DATE?



EASY TO FIND?



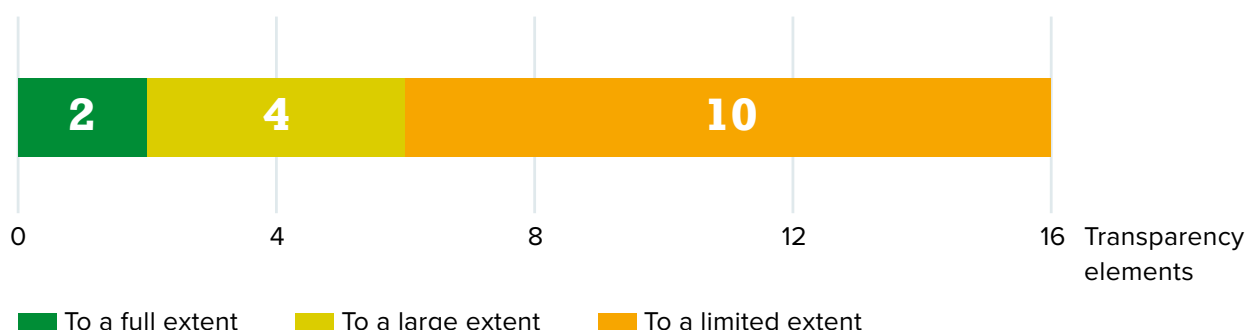
AVAILABLE ONLINE?

AVAILABLE
ONLINE?



Comorian national authorities publish information online for 16 transparency elements (i.e. 'Public Access').¹⁰ Of those elements, 13% fully meet the information requirements of the FiTI Standard.¹¹

Is information in accordance with the FiTI Standard available online?



Among the various General Directorates within the Ministry of Agriculture, Fisheries, Environment, Tourism and Handicrafts (MAPETA), the General Directorate of Fisheries Ressources (DGRH) is responsible for fisheries management in Comoros.

The main tool through which Comorian authorities publish fisheries information online is the **DGRH website**. This website hosts a variety of important information on the country's marine fisheries sector across different areas of fisheries management. The most in-depth information is available with regards to Comoros' **artisanal fisheries** - as provided through the annual **Fisheries Statistical Bulletins**, which cover fisher and vessel numbers, catch data, statistics on fisheries production among other areas.¹² This granular level of detail is highly important given that fishing in Comoros is almost exclusively artisanal in nature. The website also includes a registry of the main legal and administrative texts¹³, such as laws, policy documents and co-management plans, as well as a fisheries dashboard¹⁴ that summarises a wide range of key data on the fisheries sector in Comoros.¹⁵ The DGRH website and the statistical bulletins were funded by the World Bank's SWIOFish 1 project.

¹⁰ From a total of 39 transparency elements, this assessment considers five as being 'Not applicable' to the Comoros' marine fisheries sector, whereas an additional four elements are considered as 'Not produced' (meaning the government has not collected or compiled the information requested under this element).

¹¹ The information relating to the remaining 87% are available online but incomplete (i.e. outdated and/or difficult to find).

¹² <http://www.comorespeche.org/index.php/statistics/15-services-des-statistiques/51-page-bulletins>

¹³ <http://www.comorespeche.org/index.php/documentation>

¹⁴ <http://www.comorespeche.org/index.php/statistics/15-services-des-statistiques/47-page-2>

¹⁵ However, the registry of legal and administrative texts does not contain some key documents. For example, a new plan to develop Comoros' coastal fisheries (including subsistence, traditional, artisanal and sport fisheries) was introduced by national authorities in 2021 but does not feature in the registry, nor is it available on any other government (or non-government) website.





However, beyond the statistical bulletins, no **formal mechanism** exists through which the government regularly publishes fisheries information on the website. For example, the DGRH does not produce annual reports detailing its activities over the prior year. In fact, during the 12-month assessment period of this report, very little new information was uploaded to the website, suggesting that it is not maintained on a routine basis.

In addition, there are many examples where the information that is on the DGRH website falls short of the requirements of the FiTI Standard. For example, there is no information available on:

- the vessels authorised to fish in Comorian waters (or their catches, payments, transshipments etc.);
- the activities of Comoros-flagged fishing vessels operating in foreign waters;
- the activities undertaken by the government to ensure that fishing vessels and the post-harvest sector comply with national legislation;
- the subsidies granted by the government to the marine fisheries sector;
- the Official Development Assistance used by the government to develop the marine fisheries sector (outside of the SWIOFish 1 project).

There is also no substantial information on any of these topics available on other government websites. This lack of online transparency makes it very difficult for internet users to gain accurate insights into what is happening in the fisheries sector in Comoros.

However, it should be noted that the online publication of information has not historically been part of government practice in Comoros. Efforts to achieve online transparency in fisheries management are often linked to the level of development of a country's fisheries sector. Budgetary constraints and limited human resources within the DGRH pose sizeable challenges to the Directorate's ability to make fisheries information available online in a structured and periodic manner.

Internet usage also remains low throughout the country and could even be considered a luxury item. The International Telecommunication Union (ITU) estimates that only 8.5% of the population uses the internet (according to 2018 figures).¹⁶ This is important contextual information given this assessment evaluates if the government publishes information online.

The conclusion of the SWIOFish 1 project in Comoros at the end of 2021 also unfortunately raises questions around whether the DGRH website will continue to be used as a platform for publishing information online and whether the government will be able to continue independent production of the annual statistical bulletins.¹⁷

¹⁶ <https://www.itu.int/en/ITU-D/Statistics/Documents/statistics/2021/December/PercentIndividualsUsingInternet.xlsx>

¹⁷ During the government feedback period of this evaluation, the DGRH expressed a clear willingness to continue producing the annual bulletins but stated that a lack of available financial resources meant that the 2021 edition may be the last. The continuity of these bulletins is also highlighted as an objective in national documents such as the *Plan d'Aménagement des Pêcheries Côtières en Union des Comores (2021-2026)*.

UP TO DATE?

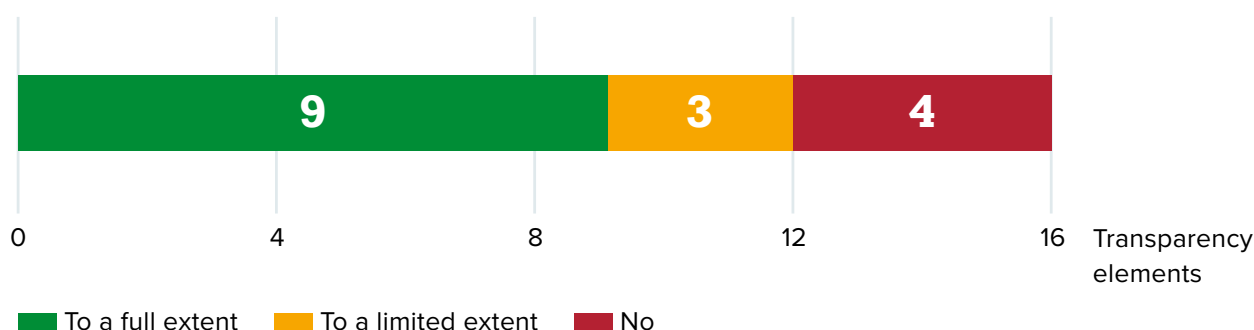
UP TO DATE?



Information published online is considered to be fully up to date for 9 out of the 16 transparency elements (or 56%).

Fish is a renewable resource that can, if sustainably managed, remain accessible and beneficial for generations. Those making decisions affecting fisheries must be able to have quick and easy access to the latest available data. The importance of up-to-date information takes on an even greater dimension when it comes to time-sensitive issues such as the production of catch data or scientific stock assessments.

Is the published information provided in a timely, up-to-date manner?



As the national authorities of Comoros do not adopt a **structured approach** to publishing fisheries information on government websites, the information that is available online varies considerably in terms of when it was published.¹⁸

Some information, such as artisanal catch data, is updated regularly with the publication of each new annual Fisheries Statistical Bulletin. However, information on other areas of fisheries management is often several years old, which reduces its potential value to contribute to sustainable management decisions. These areas include **formal and informal employment data** and information on **imports of fish and fishery products**.

It should be noted that moving from an ad hoc to a more structured approach to making information available online (e.g. through regular annual reports) is an effective catalyst for increasing transparency in the sector.

¹⁸ Due to the limited availability of information on government websites, this assessment often failed to determine whether the information published is fully up to date and therefore reflects current government practice, or whether more recent reforms have been adopted but are simply not yet mentioned online.

EASY TO FIND?

EASY TO FIND?



Information published online by the Comoros' government is relatively easy to find, as information for 9 out of 16 transparency elements (or 56%) can be easily found by a layperson.¹⁹

Governments have the responsibility to manage fisheries on behalf of their citizens – and inform them about the current status, opportunities and challenges facing the sector. In the digital age, websites remain one of the most popular mediums to convey such information. However, websites are passive communications channels, and stakeholders have to purposely visit the site, search for the desired content and navigate to find information. If this is difficult or time consuming, stakeholders may lose interest, leaving potentially important information unread and underutilised.

Is the published information easy to find on a government website from a non-expert point of view?



As already noted, most of the fisheries information published by the Comorian government is concentrated on the website of the General Directorate of Fisheries Resources (DGRH). This site is logically structured, with most of the information well presented and therefore easy to find. Beyond the DGRH website, there is also fisheries information to be found. However, locating it is often very difficult and time consuming, as relevant information is spread across various sites with no clear signposting to guide interested stakeholders towards it.

¹⁹ This assessment analysed how easy or difficult it is for a layperson to find information about Comoros' marine fisheries sector, instead of stakeholders with a background in fisheries and therefore holding a unique advantage in their capacity to locate the information.

For example, an insightful report prepared by an independent consultant on behalf of the DGRH that focuses on Comoros' marine fisheries sector through the lens of private sector investment can be found online.²⁰ The report provides a very detailed overview of the sector, however, is buried deep on the website of the National Agency for Promotion of Investment (ANPI), a government body with no immediate link to fisheries. The report also does not appear on the DGRH website. This increases the likelihood that stakeholders interested in learning more about the Comoros' fisheries sector will not come across this important source of information.

- In addition, many documents published online by the Comorian government are not searchable (e.g. via the CTRL + F function). Interested stakeholders are therefore forced to engage in the time-consuming task of manually scrolling through the entire document to find the specific information they seek. Such documents include the *Code des Pêches et de l'Aquaculture (2020)*²¹ and the various co-management agreements signed by the government and different coastal village communities.²²
- Comorian government websites often employ different domain names, such as ".gov.km", ".gouv.km" or simply ".km". This can cause problems when trying to determine whether a website actually belongs to the government or to a third party.



²⁰ [https://investcomoros.net/fr/assets/fichiers/Rapport%20final%20\(juillet%202018\).pdf](https://investcomoros.net/fr/assets/fichiers/Rapport%20final%20(juillet%202018).pdf)

²¹ <http://www.comorespeche.org/images/images/documents/cadre/REVISION-CODE-DE-LA-PECHE-2020.pdf>

²² See for example: http://www.comorespeche.org/images/images/documents/cadre/accord_Signe_Hantsindzi_VF.pdf or http://www.comorespeche.org/images/accord_Ndroud_Signe_09.01.2020.pdf

GOOD TRANSPARENCY PRACTICES



There are several notable examples where Comorian national authorities publish information on the country's fisheries sector that goes beyond minimum standards and is considered by the FiTI as a **good transparency practice**.



Granularity:

- The Fisheries Statistical Bulletins provide interested stakeholders with a wide range of very granular data on the artisanal fisheries of Comoros. These include disaggregated information on vessel numbers, fishing effort and catch data. The figures for the previous four years are also provided to support public understanding of trends and changes in the data over time.



Comprehensibility:

- Furthermore, each bulletin includes an annex that offers readers a variety of highly visualised graphs and tables for the five main species caught by the artisanal sector that year. Separate graphs are provided for the top five demersal catches and the top five pelagic catches on both a national level and for each of the islands of Comoros.



Finally, this assessment found that Comorian national authorities rarely integrate features into government websites or documents to ensure that published information can be freely used (e.g. via search and filter functions), re-used and redistributed by anyone.

For example, the DGRH website only hosts information that is non-interactive – no data can be extracted and imported into an Excel document for further analysis.

Furthermore, no information was found over the course of this assessment to indicate whether fisheries-related data provided by Comorian national authorities is released under an open and unrestricted license, such as those developed by Creative Commons.²³

²³ Licenses should be published and linked to open data to ensure users can easily find and understand the conditions of data access and reuse. For more information, please refer to: <https://opendatacommons.org/licenses/>

RECOMMENDATIONS FOR NATIONAL AUTHORITIES OF COMOROS

While the national authorities of Comoros publish some information on the country's marine fisheries online, there are several ways to further strengthen transparency in the management of the sector:



1. Make currently unpublished information publicly available

There are several areas of fisheries management where government information is currently not being published. Publication of this information would strengthen transparency levels and also increase trust in national fisheries authorities. This includes for example:

- Information on large-scale fishing in Comorian waters (vessels, government revenues, catch data, etc.);
- Government revenues from issuing fishing licences to the artisanal sector;
- Comprehensive data on employment of formal and informal fishers;
- A list of public sector fisheries projects implemented through Official Development Assistance (ODA) funding
- Activities undertaken by the government to ensure compliance of fishing vessels and the post-harvest sector with national legislation;
- Import data for fish and fish products.

Even if the World Bank's SWIOFish 1 project has concluded in Comoros, the DGRH website remains the optimal government portal for the continued publication of new fisheries information online. Migrating fisheries data, reports and other documents relevant to Comoros' fisheries sector from other government websites (such as the National Agency for Promotion of Investment) to the DGRH website would render it an even more useful source of information.

Similarly, it is important for the government to clearly state whether certain areas of fisheries management simply do not pertain to the national context in Comoros. For example, a lack of online transparency makes it difficult to determine whether the government provides subsidies to certain aspects of the marine fisheries sector or whether Comoros holds any active fisheries access agreements with foreign partners.



2. Address information gaps

Although the national authorities of Comoros collate some data on specific areas of the country's marine fisheries, there are other important areas for which government data is notably absent, likely due to insufficient research or resources allocated for data collection. Gaps in information exist on issues such as:

- The state of the fisheries resources
- Information on beneficial ownership within the fisheries sector.

Acknowledging the limited resources available in Comoros for the collection of fisheries data, these information gaps could be addressed with the support of international donors. This TAKING STOCK assessment can serve as a solid basis to demonstrate to donors where these information gaps exist.

3. Publish information via regular, structured reports

Beyond the Fisheries Statistical Bulletins, the government of Comoros does not publish online a regular report that brings together information on the diverse aspects of the country's marine fisheries into a single reliable source. Fisheries information is generally published via an ad hoc approach and is often spread across multiple government websites.

Publishing, for example, an annual report summarising the work of the DGRH would provide an accessible overview of important themes such as legal developments, law enforcement activities or progress in implementing national fisheries policies and programmes.

4. Centralise all government websites under a single restricted domain name

Comorian government websites currently employ a variety of domain names such as ".gov.km", ".gouv.km" and ".km". It is today common practice for public sector bodies of the same country to use the same restricted domain name to serve the public via the internet. This signals authenticity and allows internet users to quickly recognise that the agency's services are official and that the website can be considered an authoritative and credible source of information. Centralising all government websites under a single domain name would allow the national authorities of Comoros to benefit from these advantages.

Strengthening transparency of Comoros' marine fisheries sector by, among other things, reviewing and prioritising these recommendations, should be based on ongoing discussions with stakeholders, such as fishers, fishing companies, civil society and academia. This may further help to identify other important information gaps regarding national priorities which have not been covered under this assessment (such as the impacts of climate change or the interactions between fisheries and other sectors in the blue economy).

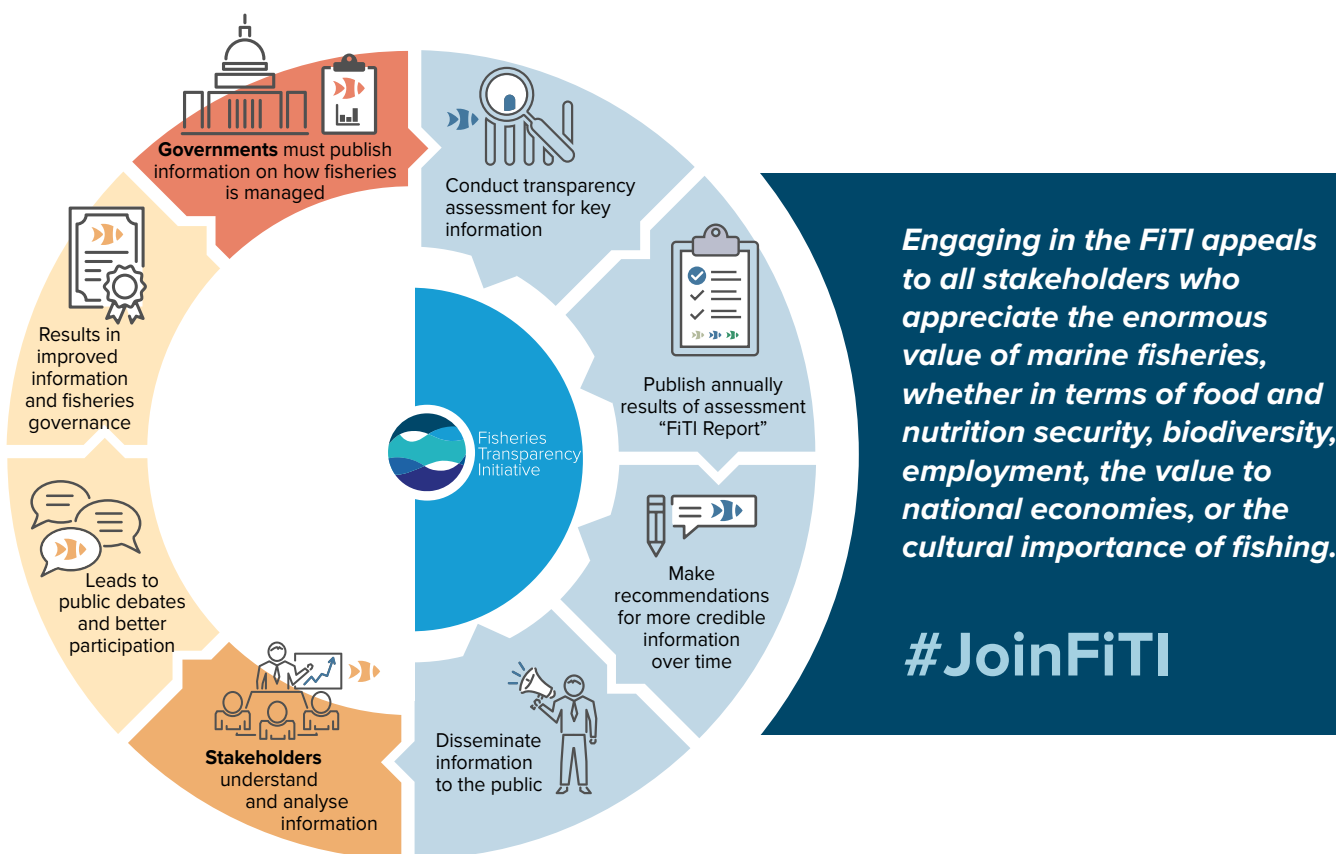
TRANSPARENCY NEEDS TRUST

Public access to information on how Comoros' marine fisheries sector is being exploited is fundamental for good governance. This TAKING STOCK assessment provides a sound starting point for national authorities in Comoros to enhance and maintain high levels of transparency in marine fisheries management. But it does not tell the whole story: challenges still exist that are unlikely to be overcome by a single actor working alone. Such challenges involve determining whether information that is not published online simply does not exist, or whether information that is disclosed is perceived as credible by stakeholders. Addressing such challenges requires a comprehensive and inclusive approach.

Therefore, a collective effort is needed from all relevant stakeholders to incorporate a variety of perspectives and enhance transparency and trust over time.

The Fisheries Transparency Initiative (FiTI) provides such a unique combination of transparency and participation. The FiTI is implemented in countries through National Multi-Stakeholder Groups, consisting of representatives from government, business and organised civil society. These groups work collectively to:

- » assess the information in the public domain against the FiTI Standard;
- » make recommendations on how to prioritise the closure of information gaps; and
- » provide suggestions on how information published by national authorities can be strengthened to further raise levels of openness and public access to information.



ANNEX: ASSESSMENT PROCEDURES

This TAKING STOCK assessment evaluates the disclosure practices of Comorian national authorities across 12 thematic areas of marine fisheries management²⁴, as defined by the FiTI Standard.

In order to avoid ambiguities during the assessment, these 12 thematic areas have been further broken down into **39 transparency elements**. For example, thematic area #1 'Fisheries Laws, Regulations and Official Policy Documents' is broken down into three transparency elements.

The assessment is focused entirely on the availability of information²⁵ provided by Comorian national authorities through their own websites and online publications.

This report, the first for Comoros, does not only seek to provide an overview of what the government publishes regarding a number of key areas of its marine fisheries sector. It also intends to provide a sound basis of information to spark interest among various governmental and non-governmental stakeholders.

The assessment does **not** try to capture and display the actual underlying information behind each transparency element (e.g. number of vessels), nor does it undertake an independent verification of whether information disclosed online by national authorities is complete or correct. Nevertheless, if compelling evidence of unreliable or contradicting information has been found, it is noted in the Detailed Assessment Report.

Within the scope of this assessment, several different entry points have been utilised to evaluate whether information on the Comoros' marine fisheries sector is published online by national authorities, such as²⁶ :

- By directly accessing websites of national authorities;
- By utilising external search engines, such as Google.

The assessment was conducted as a **desktop study**, without relying on initial input or contributions from national authorities.

The assessment was conducted over a 12 month period (October 2021 – September 2022). The process was officially launched on 6 October 2021 when the Ministry of Agriculture, Fisheries, Environment, Tourism and Handicrafts (MAPETA) and the General Directorate of Fisheries Resources (DGRH) were informed about the upcoming assessment, its key parameters and benefits.

The General Directorate of Fisheries Resources (DGRH) was invited to comment on the initial research findings prior to the publication of this report. The timeframe for this review was between 24 October 2022 and 7 November 2022.

We would like to thank the government for taking advantage of the opportunity to provide feedback. Comments were received on 11 November 2022, reviewed and incorporated into the report, where necessary.

The overall assessment process was conducted under the supervision and responsibility of the FiTI International Secretariat, with significant input from researchers and reviewers.

24 Information on inland fisheries and aquaculture does not form part of this assessment.

25 Kindly note that in the context of this research, the terms '*data*' and '*information*' are used interchangeably. It is acknowledged that while closely intertwined, they differ in meaning and usage (e.g. data is the raw fact, which should be processed to gain information). However, this difference is not of major relevance for this assessment.

26 Information is only considered available online if it is proactively published on a government website and is available without access restrictions (e.g. the need to register online, request the data from a civil servant via email or pay a fee).

As part of this TAKING STOCK assessment, several transparency elements were considered as not applicable for Comoros' marine fisheries:

—	Agreements allowing Comorian-flagged vessels to fish in third country waters	Although there is evidence that at least one Comorian-flagged vessel fishes in third country waters, its activities appear to be carried out through a private licence purchased directly from the host country (rather than through a bilateral fisheries agreement).
—	Landings in Comorian ports	Fish caught by foreign vessels fishing in Comorian waters are not landed in Comoros, as the country does not have the appropriate infrastructure and processing facilities to receive them.
—	Small-scale discards	As most fish caught by Comorian artisanal fishers is destined for subsistence purposes, it is assumed that discards from the small-scale sector are minimal.
—	Exports of fish and fish products	No evidence could be found that Comoros currently exports fish or fish products.
—	Aid for the development of foreign fisheries	Comoros does not provide Official Development Assistance (ODA) to the fisheries sectors of foreign countries.



TAKING STOCK

Online Transparency of Fisheries
Management Information



2022

Summary Assessment Report
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